

US EPA ARCHIVE DOCUMENT

December 22, 1999

Mr. Deborah Dalton
Ms. Kathleen Bailey
U.S. EPA
401 M Street, SW
Washington, DC

RE: Review of Environmental Protection Agency Public Participation Policies

Dear Ms. Dalton and Ms. Bailey:

These comments are submitted on behalf of the Chemical Specialties Manufacturers Association (CSMA) regarding the request for comment on EPA Public Participation Policies, see 64 Federal Register 66906. CSMA is a voluntary nonprofit trade association of some 400 companies engaged in the manufacture, formulation, distribution and sale of non-agricultural pesticides, including antimicrobials, for household, institutional and industrial uses. CSMA requested additional time to respond to this request for public comment, however, because of an EPA timeline our request was denied.

CSMA's primary comment with respect to the public participation policies is that sufficient time should be provided for interested parties to respond. We are constantly in the process of responding to a variety of EPA actions and often have to request time extensions because of short deadlines. It would be very useful if the Agency would adopt as its policy a 60-day comment period, with 120-days for substantial actions, with the understanding that extensions may be needed depending on the complexity of the matter.

We look forward to reviewing the report and look forward to commenting on this matter in the future as the Agency continues to review its policy.

Sincerely,

Brigid D. Klein
Regulatory Counsel